

HUBTOWN

Regd. Office: Plaza Panchsheel, "A" Wing, 5th floor, Hughes Road, Behind Dharam Palace, Grant Road (West), Mumbai - 400007 INDIA
Tel.: +91-22-67037400 • Fax: +91-22-67037403 • www.hubtown.co.in. • CIN:L45200MH1989PLC050688

February 14, 2019

To,

BSE Limited The Corporate Relationship Department 1 st Floor, P.J. Towers, Dalal Street Fort, Mumbai – 400 001 Scrip Code: 532799	National Stock Exchange of India Limited The Listing Department Exchange Plaza, Bandra Kurla Complex Bandra (East), Mumbai – 400 051 Symbol: HUBTOWN
--	---

Dear Sir,

Sub: Amended Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

Ref: Outcome of Board Meeting dated February 13, 2019

Further to our letter dated February 13, 2019 on the captioned reference subject, we annex a copy of the revised 'Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information' as approved by the Board of Directors of the Company at its meeting held on February 13, 2019.

You are requested to kindly take the said revised code on your record.

Thanking you,

Yours faithfully,
For Hubtown Limited

M Degaonkar

Madhavi Degaonkar
Authorised Signatory



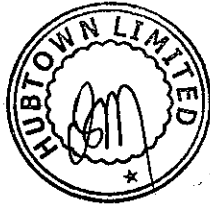
HUBTOWN

HUBTOWN LIMITED

**CODE OF PRACTICES AND PROCEDURES
FOR FAIR DISCLOSURE
OF
UNPUBLISHED PRICE SENSITIVE INFORMATION**

HUBTOWN LIMITED
CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE
OF
UNPUBLISHED PRICE SENSITIVE INFORMATION
TABLE OF CONTENTS

SR. NO.	PARTICULARS	PAGE NO.
I.	Preamble	1
II.	Objective	1
III.	Effective Date	1
IV.	Interpretation	1
V.	Principles of Fair Disclosure	1 - 3
VI.	Policy for determination of Legitimate Purposes	3
VII.	Disclosure on website	3
VIII.	Amendment	4



HUBTOWN LIMITED

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

[Framed under Regulation 8 (A) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

I. PREAMBLE :

Pursuant to Clause 8 (1) of Chapter IV of the SEBI (Prohibition of Insider Trading) Regulations, 2015 read with SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 (SEBI PIT Regulations), the Board of Directors of Hubtown Limited has amended the "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information" (Code of Fair Disclosure) to include policy for determination of 'Legitimate Purposes' notified on December 31, 2018 and applicable with effect from April 1, 2019.

II. OBJECTIVE :

This Code intends to provide a standard framework and policy for fair disclosure of Unpublished Price Sensitive Information (UPSI) envisaged in Schedule "A" to SEBI (Prohibition of Insider Trading) Regulations, 2015], preserve the confidentiality of UPSI and to prevent trading based on UPSI.

III. EFFECTIVE DATE :

The Code will be effective from February 2015.

IV. INTERPRETATION :

Words and expressions used but not defined in this Fair Disclosure Code shall have the same meaning assigned to them in the SEBI PIT Regulations or the Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulations) Act, 1956 or the Companies Act, 2013 and the rules and regulations made thereunder, as the case may be, including amendment(s)/modification(s) thereto.

V. PRINCIPLES OF FAIR DISCLOSURE :

The Company in compliance with the SEBI PIT Regulations shall follow the practices and procedures laid down herein below for fair disclosure of price sensitive information :

1. **Prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.**

The Company Limited shall promptly make public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.



2. Uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.

The Company shall make uniform and universal dissemination of unpublished price sensitive to avoid selective disclosure.

3. Designation of a senior officer as a chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.

The Company Secretary and Compliance Officer of the Company shall be the Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.

4. Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.

The Company shall make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.

5. Appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.

The Company shall ensure that appropriate and fair responses and replies are promptly provided /given to the news reports and any request for verification of market rumors received from regulatory authorities.

6. Ensuring that information shared with analysts and research personnel is not unpublished price sensitive information.

The Company shall ensure that no unpublished price sensitive information is shared with analysts and research personnel.

7. Developing best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.

The Company shall follow best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences posted on the official website to ensure official confirmation and documentation of disclosures made.



8. Handling of all unpublished price sensitive information on a need-to-know basis.

The Company shall handle all unpublished price sensitive information on a need-to-know basis and shall not be communicated, provided or allowed access to, except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

9. Communication of Unpublished Price Sensitive Information for legitimate purposes only.

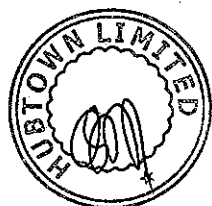
The Company shall ensure that no insider communicates, provides or allows access to any Unpublished Price Sensitive Information relating to the Company to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

VI. POLICY FOR DETERMINATION OF 'LEGITIMATE PURPOSES'

- i. 'Legitimate Purpose' shall mean sharing of Unpublished Price Sensitive Information in the course of business by an insider with partners, collaborator, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals, other advisors or consultants provided that such sharing has not been carried out to evade or circumvent the prohibitions of the SEBI PIT Regulations;
- ii. Any person in receipt of Unpublished Price Sensitive Information pursuant to a legitimate purpose shall be considered as an 'Insider' for the purposes of SEBI PIT Regulations and due notice shall be given to such person to maintain confidentiality of such Unpublished Price Sensitive Information in compliance with the said Regulations. Such person is also required to ensure the confidentiality of Unpublished Price Sensitive Information shared with her / him, in compliance with the SEBI PIT Regulations; and
- iii. A structured digital database shall be maintained containing the names of such persons or entities, as the case may be, with whom information is shared for legitimate purposes alongwith the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Adequate and effective system of internal controls will also be laid out to secure such database. Documents containing confidential information shall be kept secured. Computer files must have adequate security login, password, etc.

VII. DISCLOSURE ON WEBSITE :

This Code shall be disclosed on the website of the Company at www.hubtown.co.in.



VIII. AMENDMENT :

In case there are any regulatory changes requiring modification to this policy, the same shall be reviewed and amended with the approval of the Board of Directors. However, the amendment in the regulatory requirements shall be binding on the company and shall prevail even if the same is not incorporated in this Policy.

[Policy for determination of 'Legitimate Purposes' Clause (VI) of this Code formulated pursuant to SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 shall come into effect from April 1, 2019]

